

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Robert J. Waldron, Jr.  
Debtor  
and

Thomas Cunningham, Carolyn Cunningham,  
Elizabeth A. Walsh, Elizabeth A. Walsh, Donna M.  
Waldron, and Mary T. Kane

Co-Debtors

LoanCare, LLC, or its Successor or Assignee  
Movant  
vs.

WILLIAM C. MILLER, Esq.  
Robert J. Waldron, Jr.  
Thomas Cunningham, Carolyn Cunningham, Elizabeth  
A. Walsh, Elizabeth A. Walsh, Donna M. Waldron, and  
Mary T. Kane  
Respondents

Chapter 13  
Bankruptcy No. 17-16763-elf

**CERTIFICATION OF SERVICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND  
CERTIFICATION OF SERVICE OF NOTICE OF MOTION, RESPONSE DEADLINE AND  
HEARING DATE**

I, Lauren M. Moyer, attorney for LoanCare, LLC, hereby certify that I served a true and correct copy of the foregoing Motion for Relief from Automatic Stay and Certification of Service of Notice of Motion, Response Deadline and Hearing Date, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: February 25, 2021

Robert J. Waldron, Jr.  
825 Sunnyside Avenue  
Norristown, PA 19403

Brandon J. Perloff  
315 North 12th Street  
Ste 204  
Philadelphia, PA 19107

WILLIAM C. MILLER, Esq.  
Chapter 13 Trustee  
P.O. Box 1229  
Philadelphia, PA 19105

Thomas Cunningham  
3245 Bay Avenue  
Ocean City, NJ 08226

Carolyn Cunningham  
3245 Bay Avenue  
Ocean City, NJ 08226

Elizabeth A. Walsh  
3245 Bay Avenue  
Ocean City, NJ 08226

Elizabeth A. Walsh  
3245 Bay Avenue  
Ocean City, NJ 08226

Mary T. Kane  
3245 Bay Avenue  
Ocean City, NJ 08226

Donna M. Waldron  
3245 Bay Avenue  
Ocean City, NJ 08226

/s/ Lauren M. Moyer, Esquire

MARGARET GAIRO, ESQUIRE ID # 34419  
LAUREN M. MOYER, ESQUIRE ID # 320589  
JAMES FRENCH, ESQUIRE ID # 319597  
JOHN M. KOLESNIK, ESQUIRE ID # 308877  
Attorney for LoanCare, LLC  
123 South Broad Street, Suite 1400

Philadelphia, PA 19109  
Telephone: (215) 790-1010  
Facsimile: (215) 790-1274  
Email: [ecfmail@mwc-law.com](mailto:ecfmail@mwc-law.com)